## STATE OF CONNECTICUT

## **CONNECTICUT SITING COUNCIL**

CONNECTICUT SITING COUNCIL : LIFE CYCLE 2011

INVESTIGATION INTO THE ELECTRIC

TRANSMISSION LINE LIFE-CYCLE COSTS : NOVEMBER 3, 2011

## MOTION OF THE OFFICE OF CONSUMER COUNSEL FOR AN ADDITIONAL HEARING DATE

The Office of Consumer Counsel (OCC), a party in the above-captioned proceeding, is in receipt of the motions for extension of time to file interrogatory responses from The Connecticut Light and Power Company (CL&P) and The United Illuminating Company (UI). OCC understands the difficult circumstances that CL&P and UI are in at present. However, OCC respectfully moves that the Connecticut Siting Council (CSC) establish an additional hearing date to give OCC a reasonable opportunity for cross-examination.

In granting CL&P and UI's Motions, CSC itself acknowledged that its consultant would need more time to review CL&P's interrogatory responses to the CSC second set of interrogatories. Therefore, the CSC requests that CL&P answer as many of the CSC interrogatories as possible before the close of business on November 11, 2011, in advance of the November 15, 2011 hearing dates.

OCC in addition notes the following facts:

- (1) The CSC motion response does not address a due date for the OCC interrogatories submitted on October 21, 2011;
- (2) The offices of the OCC and the CSC are closed on November 11, 2011 for Veteran's Day;
- (3) The single hearing date currently scheduled in this proceeding is November 15, 2011;

(4) It appears that the November 15, 2011 hearing is only scheduled to last for a relatively short time period; and

(5) while the CSC's grant of the Motions asks that interrogatory responses be completed by November 11, 2011 to the extent possible, the deadline would be November 14, 2011, just one day before the relevant hearing.

Given the above circumstances, the OCC requests that an additional hearing date be scheduled in order to conduct an adequate review of the interrogatory responses to the CSC and OCC interrogatories, and to provide for time for cross-examination by all parties. The OCC also makes this request (1) because it appreciates the large stakes at issue in this proceeding for Connecticut ratepayers; and (2) because of the complicated and technical nature of the interrogatories and the anticipated responses.

For these reasons, we respectfully request that the CSC set an additional hearing date at least one week after the November 15, 2011 hearing.

Respectfully submitted,

ELIN SWANSON KATZ CONSUMER COUNSEL

By: \_\_\_\_\_ Margaret Bain Associate Rate Specialist

I hereby certify that a copy of the foregoing has been mailed, electronically sent and/or hand-delivered to all known parties and intervenors of record this 3<sup>rd</sup> day of November, 2011.

Joseph A. Rosenthal Commissioner of Superior Court